

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES, INC.,
JADE CHENG, JASON YUYI, CATHY YU,
CAROLINE MARAFAO CHENG, PUSHUN
CHENG, CHANGZHEN NI, JUNFANG YU,
MEIXIANG CHENG, FANGSHOU YU, and
CHANGHUA NI

Plaintiffs,

v.

HEWLETT-PACKARD FINANCIAL SERVICES
COMPANY, HEWLETT-PACKARD
FINANCIAL SERVICES (INDIA) PRIVATE
LIMITED, HEWLETT PACKARD ENTERPRISE
COMPANY, and DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

PLAINTIFFS' STATUS REPORT

WHEREAS, the Court ordered on March 24, 2021 (ECF 504) that Plaintiffs Cheng, Yuyi and Yu each file affidavits by May 1, 2021, detailing the actions taken to make arrangements to travel to the United States for the trial.

WHEREAS, the Court stated that Plaintiff Cheng may comply with the affidavit requirement by filing an affidavit under oath stating both that he resides in the United States presently and intends to continue to do so between now and the trial.

WHEREAS, the Court ordered that by May 1, 2021, the Family Plaintiffs shall show cause why the Court should not require them to file equivalent affidavits by July 1, 2021.

PLAINTIFFS HEREBY submit this Status Report and accompanying affidavits to apprise the Court of Plaintiffs' travel arrangements.

I. Affidavit of Plaintiff Yuyi

Attached hereto as Exhibit 1 is the affidavit of Plaintiff Yuyi, detailing actions he has taken to make arrangements to travel to the United States for trial.

II. Affidavit of Plaintiff Yu

Attached hereto as Exhibit 2 is the affidavit of Plaintiff Yu, detailing actions she has taken to make arrangements to travel to the United States for trial.

III. Affidavit of Plaintiff Cheng

Attached hereto as Exhibit 3 is the affidavit of Plaintiff Cheng, confirming his current and continued residence in the United States.

IV. Family Plaintiffs

Each Family Plaintiff is working diligently to obtain the required travel permissions and documents. To travel to the U.S., they will need: (1) passports; (2) U.S. visas; and (3) permission to travel from the Chinese government. To get a visa, the applicant must already have a passport, and to get permission to travel, the applicant must already have both a passport and visa in hand. As soon as each Family Plaintiff receives the necessary documents, he or she will promptly apply for a visa and then for permission, as applicable.

Family Plaintiffs Changhua Ni, Fangshou Yu, and Junfang Yu do not presently have passports. They have appointments for the passport applications scheduled for May 6, 2021 in Beijing. They are expected to receive their passports approximately 15 days after their appointments, at which point they will promptly begin the process of applying for a U.S. visa. Attached hereto as Exhibits 4 – 6 are screenshots confirming the passport application appointments, as well as certified translations of the same.

Family Plaintiffs Pushun Cheng, Changzhen Ni, and Meixiang Cheng are in the process of submitting their applications for visas to the U.S. Consulate. They anticipate being able to submit these applications by the week of May 3, 2021.

To ensure the travel process moves along as quickly as possible, each Family Plaintiff will request for permission as soon as he or she receives a U.S. visa.

While Plaintiffs are happy to provide the Court further updates on their progress if it wishes, Plaintiffs respectfully submit that the Family Plaintiffs are proceeding diligently to ensure the necessary travel arrangements will be in place for their appearance at trial in 2022.

Dated: April 30, 2021

Respectfully submitted,

/s/ Luke Nikas

Luke Nikas

Quinn Emanuel Urquhart & Sullivan, LLP

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Counsel to Plaintiffs

CERTIFICATE OF SERVICE

I, Luke Nikas, hereby certify that on April 30, 2021, I caused a copy of Plaintiffs' Status Report accompanied by Exhibits 1 – 6, to be served by ECF upon Defendants' counsel of record.

/s/ Luke Nikas
Luke Nikas